

# **EXHIBIT 11**

## Isabel Pina

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**From:** Alejandra Avila  
**Sent:** Wednesday, April 10, 2019 10:39 AM  
**To:** Robins, Jeffrey (CIV)  
**Cc:** Glenn Moramarco; Kenneth Levine; Jeremy Hollander; Nina Perales; Douglas H. Hallward-Driemeier; Raishay Lin; Siegle, Emerson (Emerson.Siegle@ropesgray.com); Walker, James (CIV)  
**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Jeff,

Thank you for this supplemental production. We now have had an opportunity to review your responses, and Defendant-Intervenors continue to believe the production is incomplete and non-responsive.

Defendants continue to fail to answer our interrogatories 9-12 and have only provided partial responses to interrogatories 13 and 14. Defendants have also not fully responded to our requests for production numbers 5, 6, 7(3), 8, and 9, and have failed to identify any search terms and custodians as suggested by Defendant-Intervenors in our December 19, 2018 deficiency letter to you or propose any means to narrow the scope of the review. Defendant-Intervenors still cannot discern the scope of Defendants' previous production, whether Defendants have provided all responsive documents to our requests, and whether Defendants need to conduct additional searches. In your supplemental responses, you also do not address requests for production 7(3) and 9 at all and the deficiencies outlined in our letter in connection with these requests.

In an effort to avoid court intervention, we would like to confer with you over the phone to see if there is a way to resolve this discovery dispute.

We are available tomorrow any time from 11 am-2 pm Central or Monday any time from 10 am-4 pm Central. Please let us know what time works for you.

Thank you.

**Alejandra Ávila**  
*Staff Attorney*  
The Mexican American Legal Defense  
and Educational Fund, Inc.  
110 Broadway, Suite 300  
San Antonio, TX 78205  
P: (210) 224-5476 ext. 204  
F: (210) 224-5382



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**From:** Robins, Jeffrey (CIV) [mailto:Jeffrey.Robins@usdoj.gov]  
**Sent:** Wednesday, February 20, 2019 9:16 AM  
**To:** Alejandra Avila  
**Cc:** Glenn Moramarco; Kenneth Levine; Jeremy Hollander; Nina Perales; Jack Salmon; Douglas H. Hallward-Driemeier; Raishay Lin; Todd <Todd.Disher@oag.texas.gov> Disher; Siegle, Emerson (Emerson.Siegle@ropesgray.com); Adam

Biggs; Walker, James (CIV)

**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Counsel,

Attached are Federal Defendants' supplemental responses to Perez Defendant-Intervenors' third set of discovery requests.

Please let me know if you have any questions.

Thank you,

Jeff

Jeffrey S. Robins  
Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-1246

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**From:** Alejandra Avila <Aavila@MALDEF.org>

**Sent:** Thursday, February 07, 2019 6:35 PM

**To:** Robins, Jeffrey (CIV) <jerobins@CIV.USDOJ.GOV>

**Cc:** Glenn Moramarco <Glenn.Moramarco@law.njoag.gov>; Kenneth Levine <Kenneth.Levine@law.njoag.gov>; Jeremy Hollander <Jeremy.Hollander@law.njoag.gov>; Nina Perales <nperales@MALDEF.org>; Jack Salmon <jsalmon@MALDEF.org>; Douglas H. Hallward-Driemeier <Douglas.Hallward-Driemeier@ropesgray.com>; Raishay Lin <Raishay.Lin@ropesgray.com>; Todd <Todd.Disher@oag.texas.gov> Disher <Todd.Disher@oag.texas.gov>; Siegle, Emerson (Emerson.Siegle@ropesgray.com) <Emerson.Siegle@ropesgray.com>; Adam Biggs <Adam.Biggs@oag.texas.gov>; Walker, James (CIV) <jwalker2@CIV.USDOJ.GOV>; Alejandra Avila <Aavila@MALDEF.org>

**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Mr. Robins,

Please confirm when Federal Defendants intend to provide the supplemental production mentioned in your email below. As you know, it has been more than 7 weeks since Perez Defendant-Intervenors emailed their deficiency letter to you.

In addition, please advise whether Federal Defendants will address the remaining deficiencies noted in our letter. If Federal Defendants do not provide amended answers and a supplemental production pursuant to the deficiency letter, Perez Defendant-Intervenors will seek court intervention on this matter.

Thank you,

**Alejandra Ávila**

*Staff Attorney*

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and Educational Fund, Inc.  
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San Antonio, TX 78205  
P: (210) 224-5476 ext. 204  
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**From:** Robins, Jeffrey (CIV) [<mailto:Jeffrey.Robins@usdoj.gov>]  
**Sent:** Monday, February 4, 2019 3:19 PM  
**To:** Alejandra Avila  
**Cc:** Glenn Moramarco; Kenneth Levine; Jeremy Hollander; Nina Perales; Jack Salmon; Douglas H. Hallward-Driemeier; Raishay Lin; Todd <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)> Disher; Siegle, Emerson ([Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)); Adam Biggs; Walker, James (CIV)  
**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Counsel,

I write to advise that Federal Defendants will be supplementing the prior responses with data for the newly added states and a chart reflecting the documents that correspond with each request for production.

Jeff

Jeffrey S. Robins  
Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-1246

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**From:** Alejandra Avila <[Aavila@MALDEF.org](mailto:Aavila@MALDEF.org)>  
**Sent:** Wednesday, December 19, 2018 4:48 PM  
**To:** Robins, Jeffrey (CIV) <[jerobins@CIV.USDOJ.GOV](mailto:jerobins@CIV.USDOJ.GOV)>  
**Cc:** Glenn Moramarco <[Glenn.Moramarco@law.njoag.gov](mailto:Glenn.Moramarco@law.njoag.gov)>; Kenneth Levine <[Kenneth.Levine@law.njoag.gov](mailto:Kenneth.Levine@law.njoag.gov)>; Jeremy Hollander <[Jeremy.Hollander@law.njoag.gov](mailto:Jeremy.Hollander@law.njoag.gov)>; Nina Perales <[nperales@MALDEF.org](mailto:nperales@MALDEF.org)>; Jack Salmon <[jsalmon@MALDEF.org](mailto:jsalmon@MALDEF.org)>; Douglas H. Hallward-Driemeier <[Douglas.Hallward-Driemeier@ropesgray.com](mailto:Douglas.Hallward-Driemeier@ropesgray.com)>; Raishay Lin <[Raishay.Lin@ropesgray.com](mailto:Raishay.Lin@ropesgray.com)>; Todd <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)> Disher <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)>; Siegle, Emerson ([Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)) <[Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)>; Adam Biggs <[Adam.Biggs@oag.texas.gov](mailto:Adam.Biggs@oag.texas.gov)>  
**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Jeffrey,

Attached please find Perez Defendant-Intervenors' deficiency letter related to our third set of discovery requests.

Thank you,

**Alejandra Ávila**  
*Staff Attorney*  
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and Educational Fund, Inc.  
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